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March 28, 2014

Honorable Michael A. Shipp  
United States District Court  
District of New Jersey  
United States Courthouse  
402 East State Street  
Trenton, NJ 08608

VIA ELECTRONIC FILING

**Re: United States v. Kevin and Jennifer Kraft**  
**Civil Action No. NJD 3:12-cv-01852 (MAS)(TJB)**

Dear Judge Shipp:

This office represents Defendants Kevin and Jennifer Kraft in connection with the above-referenced matter. Please consider this letter our second request to extend the time within which the Defendants may respond to the Motion for Summary Judgment filed by Plaintiff (docket entry #18) for a period of fourteen (14) days. As per your Honor's Order (docket entry #21) extending the time, Defendants' opposition is due April 2, 2014. Any reply is due by April 9, 2014. The return date of said motion is April 16, 2014. If your Honor grants this second extension, then Defendants' opposition would be due April 16, 2014, any reply to Defendants' opposition would be due April 23, 2014. The return date of said motion would then be May 5, 2014.

The reason for this request is that Plaintiff and Defendants are in the process of negotiating the settlement of this matter and have exchanged documents to facilitate said settlement. This brief extension of time would permit Plaintiff and Defendants sufficient time to settle this matter. Plaintiff's Attorney, Stephen A. Josey, Esq. consents to this request.

Respectfully yours,

TOBIA & SORGER ESQS., LLC

/s/ Ronald L. Tobia  
RONALD L. TOBIA

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cc: Stephen A. Josey, Esq. (Via Email: [Stephen.a.josey@usdoj.gov](mailto:Stephen.a.josey@usdoj.gov))